

Subservicing Oversight Plan

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Decision

Do you need sub-servicing?

• Why use a sub-servicer?

Key Attributes

How to evaluate/Monitor Performance



What's Forbidden?

4-2, (C): Non-delegable Responsibilities (07/01/16)

The Issuer may not delegate or transfer to others (through a power of attorney or otherwise) its obligation or authority to perform the following functions:

- (1) Both Ginnie Mae MBS Programs (a) Withdraw funds from a P&I custodial account for any purpose, including making payments to security holders.
- (b) Sign any certifications to Ginnie Mae required by this Guide, the Guaranty Agreement, or otherwise requested by Ginnie Mae, with the exception that an Issuer may delegate to a sub-servicer the authority to complete the monthly certification required by Chapter 17-5, Monthly Certification Requirements, or Chapter 35-12, Pool, Loan, and Participation Accounting and Reporting.
- (c) Withdraw mortgage documents from the document custodian.
- (2) Ginnie Mae I MBS Program (a) Sign checks to security holders and to Ginnie Mae; a subservicer may, however, prepare and distribute the checks to security holders and to Ginnie Mae.
- (b) Sign remittance advice to security holders. (c) Remit guaranty fees to Ginnie Mae.
- (d) Maintain the register of security holders.
- (3) Ginnie Mae II MBS Program (a) Withdraw funds from the central P&I custodial account or any other P&I custodial account for any purpose.



So Who is on the Hook?

4-2, (B): Subservicing (07/01/16)

The Issuer remains fully responsible for the performance of any servicing functions that have been delegated to a sub-servicer. The Issuer is liable to Ginnie Mae for any representations or omissions submitted on its behalf by a sub-servicer, including those representations or omissions reflected on the Issuer's monthly report of pool and loan data to Ginnie Mae and on the Issuer's Monthly Reporting Certification in RFS.



Oversight – Pool/Loan Lifecycle

- Boarding
 - Capacity
 - Data Integrity
- Reporting to Ginnie Mae
- Maintenance (Performing Loans)
 - Customer Service
 - Month to Month



Oversight – Pool/Loan Lifecycle (cont.)

- Delinquency
 - 30 day
 - 60 day
 - 90 day plus
 - Buyouts
- Loss Mitigation
 - Modifications
 - Foreclosure
 - Claims



Oversight Compliance

- Accounting Reconciliation
 - P&I
 - T& I
 - Clearing Accounts
 - Custodial Accounts
- Close-out
 - Maturity
 - Transfer
 - Capacity analysis
 - Data integrity analysis



Oversight Compliance (Part 2)

- Issuer Audit (on sight)
 - Issuer led
 - Ginnie Mae
 - Other
- Communication Plan
 - Issuer/Sub-servicer
 - Sub-servicer borrower



Exit Strategy

- Service Levels
- What Next?
- Anything else to consider?



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